

December 8, 2006

70467

Mey Bunte
California Regional Water Quality Control Board
Central Valley
415 Knollcrest Drive, Suite 100
Redding, CA 96002

VESTRA



**Re: Implementation Schedule for Closure
Alternative 3, Consolidate and Cap
Winemucca Trading Company**

Dear Ms. Bunte:

Winemucca Trading Company is in receipt of the California Regional Water Quality Control Board's (RWQCB) letter, *Order to Submit Information Pursuant to California Water Code Section 13267, Winemucca Trading Company Limited, Inc., Former Shasta Paper Company Facilities and Properties Including the Shasta Pulp and Paper Mill Wastewater Treatment Lagoons, Shasta County*, dated November 17, 2006.

In the letter dated November 17, 2006, the RWQCB requests the following:

- Notification of the selected closure alternative
- Detailed implementation schedule for the selected closure alternative
- Financial assurances

Notification of the selected closure alternative and a detailed implementation schedule are included below. Financial assurance documentation will be submitted under separate cover.

Selected Closure Alternative

Based on the RWQCB's letter dated November 17, 2006, Regional Water Board staff have no objections to closure Alternative 3, Consolidate and Cap-in-Place, and Alternative 4, Clean Closure. At this time Winemucca Trading Company proposes to implement Alternative 3, closure of the wastewater treatment lagoons and clarifiers using Consolidate and Cap-in-Place methods.

Because Alternative 4 involves reducing the volume and toxicity of the waste and will provide for unrestricted use of the subject properties, Winemucca may reconsider this as the final closure alternative, based on economic conditions at Wheelabrator Shasta

Energy. This reconsideration will not impact the proposed tasks through 2010 or the final completion date.

Proposed Schedule

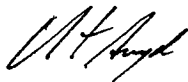
The following schedule has been prepared to complete Alternative 3 closure activities. The schedule is based on current site conditions and anticipated regulatory constraints.

Alternative 3, Consolidate and Cap Implementation Schedule	
Activity	Proposed Due Date
Revised SWPPP/ Divert Water from lagoons	By March 31, 2007
Complete CEQA process	By November 30, 2007
RAP/ RDP/ CQA Plan	By March 31, 2008
Dewater Ponds	By June 30, 2008
Windrow and dry sludge	By October 1, 2009
Consolidate and Cap Footprint	By October 1, 2010
Cap Sludge/ Rehabilitate Lagoon area	By October 1, 2011
Submit Completion Report	By January 31, 2012

Please call me at (530) 223-2585 if you have any questions regarding this submittal.

Sincerely,


VESTRA Resources, Inc.
Environmental Services Division



Clint Snyder, PG 8065
Project Manager

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe to the best of my knowledge that the information is true, accurate and complete. Winemucca Trading Company endorses the information and conclusions provided in this submittal.



Mr. Mike Sommers
Secretary
Winemucca Trading Company

12/8/2006
Date

Attachments

cc: Mike Sommers/Winnemucca Trading Company
Jack Reese/Reese Smalley Wiseman & Schweitzer
Russ Mull, Shasta County Department of Resource Management, Redding
Jim Smith, Shasta County Department of Environmental Health, Redding
Steve Baumgartner, California Department of Fish and Game, Redding